

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re FIRSTENERGY CORP. SECURITIES LITIGATION,)	No. 2:20-cv-03785-ALM-KAJ
)	
)	CLASS ACTION
)	
)	Judge Algenon L. Marbley
This Document Relates To:)	Magistrate Judge Kimberly A. Jolson
)	
ALL ACTIONS.)	ORAL ARGUMENT REQUESTED

**DEFENDANTS CHARLES JONES AND
MICHAEL DOWLING’S MOTION FOR PROTECTIVE ORDER**

Defendants Charles Jones and Michael Dowling respectfully move this Court to enter a protective order pursuant to Federal Rule of Civil Procedure 26(c)(1) deferring the depositions of Charles Jones and Michael Dowling until no earlier than September 8, 2023, a date concurrent with a stay requested by the U.S. Attorney’s Office for the Southern District of Ohio in parallel proceedings before the Public Utility Commission of Ohio (“PUCO”). As set forth in the accompanying memorandum of law, moving forward with their two-day depositions—which are noticed to begin May 23 and May 31, respectively—would inevitably infringe upon the protections afforded to Jones and Dowling by the United States Constitution. Issuing a protective order temporarily staying these depositions would mitigate this infringement and not unduly prejudice the Plaintiffs, who have stated that they intend to take more than 80 depositions in this matter and who may continue to seek discovery from dozens of other parties and non-parties while the protective order is in effect.

Jones and Dowling respectfully request that the Court set an in-person hearing for oral argument on this motion.

Dated: April 17, 2023

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CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2023, a copy of the foregoing was filed electronically.
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.
Parties may access this filing through the Court's system.

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